

# **EXHIBIT 2**

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

GEORGE JOHNSON,

Plaintiff,

vs.

DONALD P. WANG IN PERSONAM; THE  
F/V THOR, OFFICIAL NUMBER 224713,  
HER ENGINES, MACHINERY,  
APPURTENANCES AND CARGO, IN REM,

Defendants

Case No. 2:16-cv-01738-JLR

**DECLARATION OF NEIL T. LINDQUIST  
IN SUPPORT OF PLAINTIFF'S MOTION  
FOR ATTORNEY FEES**

**DECLARATION OF NEIL T. LINDQUIST**

1. I am one of the attorneys of record for the plaintiff in the above-entitled cause, have personal knowledge of the matter set forth herein and am competent to testify thereto for the limited purpose of this motion for attorney fees.

2. I have been practicing maritime law for 1.0 years. Since entering the practice last year, I have represented claimants for maritime wages, maritime personal injury and business disputes.

3. When billing by time expended, my standard rate is \$250.00 per hour.

**DECLARATION OF NEIL T. LINDQUIST IN SUPPORT OF PLAINTIFF'S  
MOTION FOR ATTORNEY FEES - 1  
CASE NO. 2:16-cv-01738-JLR**

**THE LAW OFFICE OF NEIL T.  
LINDQUIST  
12000 129<sup>th</sup> Ln. NE Suite #P400  
Kirkland, Washington 98034  
T (425) 372-7799**

1           4.       As my income is generally garnered through contingent fees, I do not make a  
2 normal practice of maintaining contemporaneous time records. Because I am a new attorney  
3 and I am not as efficient as some of my more experienced colleagues, I generally applied ninety  
4 minutes of work as sixty billable minutes. The sole exception to this is my time expended for  
5 trial preparation. Therefore, I believe I have based my reconstruction of expended time on this  
6 case with conservative estimates of my actual time expended. I did not include phone calls and  
7 emails to and from my client, communications and meetings with John Merriam, or witness  
8 interviews. Nor have I included the time spent preparing this motion. I would estimate that the  
9 attached time detail represents a reasonable and conservative estimate of the actual time I have  
10 spent on this case.

11           Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true  
12 and correct to the best of my knowledge and belief.

13           Dated this 24th day of September, 2018.

14  
15                               /s/ Neil T. Lindquist

16                               Neil T. Lindquist  
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**DECLARATION OF NEIL T. LINDQUIST IN SUPPORT OF PLAINTIFF'S  
MOTION FOR ATTORNEY FEES - 2  
CASE NO. 2:16-cv-01738-JLR**

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**CERTIFICATE OF SERVICE**

I declare under penalty of perjury of the laws of the State of Washington that on the 24th day of September, 2018, I electronically filed the above document with the Clerk of the Court using the E-FILING system which will send notification of such filing to the below addressee(s), and by the additional methods indicated:

Donald P. Wang 392 Loma Drive, Suite 201 Los Angeles, CA 90017 Telephone: (213) 465-5553 Email: <a href="mailto:skyway420@live.com">skyway420@live.com</a> <b><i>Defendant Pro Se</i></b>	By: <input type="checkbox"/> U.S. MAIL <input type="checkbox"/> FACSIMILE <input type="checkbox"/> HAND DELIVERY <input checked="" type="checkbox"/> E-FILING <input checked="" type="checkbox"/> E-MAIL
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DATED this 24th day of September, 2018, in Seattle, Washington.

/s/ Karen M. Smart

Karen M. Smart, Paralegal  
Law Office of John Merriam

THE HONORABLE JAMES L. ROBERT

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HER ENGINES, MACHINERY,  
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Defendants

Case No. 2:16-cv-01738-JLR

**DETAIL OF TIME EXPENDED BY NEIL  
T. LINDQUIST, LEAD COUNSEL FOR  
PLAINTIFF**

DATE	ACTIVITY	HOURS
3/29/2018	Review Case File	2.0
4/2/2018	Client Interview	1.0
7/9/2018	Trial Research and Preparation	2.0
7/10/2018	Records Request – Port of Seattle Police	0.5
7/10/2018	Review Order denying discovery motion	0.3
7/11/2018	Review Order denying settlement conference	0.2
7/12/2018	Review Records – Port of Seattle Police	0.3

**DETAIL OF TIME EXPENDED BY NEIL T. LINDQUIST, LEAD  
COUNSEL FOR PLAINTIFF - 1  
CASE NO. 2:16-cv-01738-JLR**

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DATE	ACTIVITY	HOURS
7/13/2018	Draft Pre-Trial Order	1.5
7/20/2018	Telephone Conversation – Officer Matthew Huston	0.5
7/23/2018	Pretrial Conference with travel time	1.5
7/23/2018	Review Minute Order regarding Pretrial Conference	0.1
7/23/2018	Review Order to Show Cause	0.1
7/24/2018	Trial Preparation	3.0
7/24/2018	Amend Pre-Trial Order	0.5
7/24/2018	Review defendant's Pretrial Order	0.1
7/24/2018	Review Wang's Response to Show Cause Order	0.2
7/25/2018	Review Order regarding Show Cause	0.2
7/27/2018	Email -Donald Wang	0.2
7/27/2018	Amend Pre-Trial Order	0.2
7/27/2018	File Pre-Trial Order	0.2
7/28/2018	Trial Preparation	2.0
7/29/2018	Trial Preparation	2.0
7/30/2018	Trial Preparation	3.0
7/31/2018	Draft Pretrial Order	0.1
7/31/2018	Trial Preparation	3.0
8/01/2018	Review defendant's Opposition to Sanctions	0.5
8/1/2018	Review defendant's trial brief	1.0
8/1/2018	Trial Preparation	3.0
8/02/2018	Review Order of Sanctions	0.2

DETAIL OF TIME EXPENDED BY NEILT. LINDQUIST, LEAD  
COUNSEL FOR PLAINTIFF - 2  
CASE NO. 2:16-cv-01738-JLR

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DATE	ACTIVITY	HOURS
8/2/2018	Trial Preparation	3.0
8/3/2018	Trial Preparation	3.0
8/4/2018	Trial Brief – Legal Research	2.0
8/4/2018	Trial Brief – Drafting	2.5
8/5/2018	Trial Brief – Drafting/Editing	4.0
8/6/2018	Trial Brief – Editing/Submitting	1.5
8/6/2018	Draft and Submit Proposed Findings of Fact and Conclusions of Law	1.5
8/06/2018	Review defendant's Proposed Findings of Fact and Conclusions of Law	0.2
8/7/2018	Trial Preparation	2.5
8/8/2018	Trial Preparation	6.0
8/9/2018	Trial Preparation	8.0
8/10/2018	Trial Preparation	8.0
8/11/2018	Trial Preparation	8.0
8/12/2018	Trial Preparation	8.0
8/13/2018	Trial preparation and trial	10.0
8/14/2018	Trial preparation and trial; post-trial debriefing of George Johnson	8.0
8/15/2018	Damages Brief – Legal Research	3.0
8/16/2018	Damages Brief- Legal Research & Drafting	3.0
8/17/2018	Damages Brief – Drafting	3.0
8/18/2018	Damages Brief – Drafting/editing	2.0

**DETAIL OF TIME EXPENDED BY NEILT. LINDQUIST, LEAD  
COUNSEL FOR PLAINTIFF - 3  
CASE NO. 2:16-cv-01738-JLR**

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DATE	ACTIVITY	HOURS
8/19/2018	Damages Brief – Editing	1.0
8/20/2018	Damages Brief – Editing & Submitting	0.4
8/20/2018	Review Wang’s brief on damages	1.0
9/12/2018	Review Findings of Fact and Conclusions of Law	0.3
9/12/2018	Review Opinion	0.5
<b>TOTAL HOURS</b>		<b>119.8</b>

Dated this 24th day of September, 2018.

THE LAW OFFICE OF NEIL T. LINDQUIST

/s/ Neil T. Lindquist

NEIL T. LINDQUIST, WSBA #52111

The Law Office of Neil T. Lindquist

1200 129th Lane NE #P400

Kirkland, WA 98034

Email: Neil@LindquistLegal.com

Tel: 425-372-7799

Attorney for Plaintiff

**DETAIL OF TIME EXPENDED BY NEIL T. LINDQUIST, LEAD  
COUNSEL FOR PLAINTIFF - 4  
CASE NO. 2:16-cv-01738-JLR**

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